

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK,

Plaintiff,

v.

CHAD F. WOLF, in his official capacity as
Acting Secretary of Homeland Security, et al.,

Defendants.

No. 20 Civ. 1127 (JMF)

R. L'HEUREUX LEWIS-MCCOY, et al., on
behalf of themselves and all similarly situated
individuals,

Plaintiffs,

v.

CHAD WOLF, in his official capacity as Acting
Secretary of Homeland Security, et al.,

Defendants.

No. 20 Civ. 1142 (JMF)

NOTICE OF CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT

PLEASE TAKE NOTICE that Plaintiffs in the above-captioned actions hereby jointly move the Court pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment on their respective claims under the Administrative Procedure Act. *See* No. 20-CV-1127, ECF No. 1 at ¶¶ 114–34; No. 20-CV-1142, ECF No. 24 at ¶¶ 112–15.

This motion is based on the accompanying Memorandum of Law in Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and in Opposition to Defendants' Partial Motion for Summary Judgment and the corrected Administrative Record filed on June 29, 2020. No. 20-CV-1127, ECF No. 75-1; No. 20-CV-1142, ECF No. 81-1.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's order dated June 3, 2020, No. 20-CV-1127, ECF No. 61, any opposition papers shall be served on or before July 24, 2020, and any reply papers shall be served within one week of the date any papers served in opposition to this motion are served.

Dated: July 10, 2020
New York, New York

LETITIA JAMES
Attorney General of the State of New York

/s/ Daniela L. Nogueira
Daniela L. Nogueira
Matthew Colangelo
Elena Goldstein
28 Liberty Street
Office of the New York Attorney General
New York, New York 10005
Phone: (212) 416-6544
daniela.nogueira@ag.ny.gov

Counsel for Plaintiff in 20 Civ. 1127

NEW YORK CIVIL LIBERTIES FOUNDATION

/s/ Antony P.F. Gemmell
Antony P.F. Gemmell
Molly K. Biklen
Jessica Perry
Jordan Laris Cohen
Christopher T. Dunn
125 Broad Street, 19th Floor
New York, New York 10004
212-607-3300
agemmell@nyclu.org

Counsel for Plaintiffs in 20 Civ. 1142